

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:) Chapter 11
)
W. R. GRACE & CO., et al., ¹) Case No. 01-01139 (AMC)
) (Jointly Administered)
Reorganized Debtors.)
) Re: Docket No. 33154

Hearing Date: March 16, 2021, at 11:00 a.m.
Objection Deadline: March 3, 2021, at 4:00 p.m.

**RE-NOTICE OF MOTION FOR SUMMARY JUDGMENT PURSUANT TO FED. R.
BANKR. P. 7056 FOR DISALLOWANCE OF CLAIM NO. 392, FILED BY GARY S.
SMOLKER, AND RELATED CLAIMS, NOS. 382 AND 4070, FILED BY HOME
SAVINGS TERMITE CONTROL, INC., AND WAYNE MORRIS, RESPECTIVELY**

TO: (i) Claimant, Wayne Morris; and (ii) Claimant, Home Savings Termite Control Inc.

On August 3, 2020, the above-captioned reorganized debtors (collectively, the “Reorganized Debtors”) filed the attached *Motion for Summary Judgment Pursuant to Fed. R. Bankr. P. 7056 for Disallowance of Claim No. 392, Filed By Gary S. Smolker, and Related Claims, Nos. 382 and 4070, Filed By Home Savings Termite Control, Inc., and Wayne Morris, Respectively* (the “Motion”) [Docket No. 33154] with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A true and correct copy of the Motion is attached hereto as Exhibit A.

Responses to the relief requested in the Motion, if any, must be in writing and be filed with the Bankruptcy Court no later than 4:00 p.m. (prevailing Eastern time) on **March 3, 2021**. At the same time, you must also serve a copy of the objections or responses, if any, upon the following: At the same time, you must also serve a copy of the objections or responses, if any, upon the following: The Law Offices of Roger Higgins, LLC (Attn: Roger J. Higgins, Esq.)

¹ W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc., or “Grace”) is the sole remaining Reorganized Debtor and Case no. 01-1139 is the sole remaining open chapter 11 case.

rhiggins@rogerhigginslaw.com, and Pachulski Stang Ziehl & Jones LLP, (Attn: Laura Davis Jones, Esq. and James E. O'Neill, Esq.) ljones@pszjlaw.com and jo'neill@pszjlaw.com.

IF NO OBJECTIONS ARE TIMELY FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

IN THE EVENT THAT ANY OBJECTION OR RESPONSE IS FILED AND SERVED IN ACCORDANCE WITH THIS NOTICE, A TELEPHONIC HEARING ON THE OBJECTION WILL BE HELD BEFORE THE HONORABLE ASHELY M. CHAN ON **MARCH 16, 2021, AT 11:00 A.M. PREVAILING EASTERN TIME.** INSTRUCTIONS WILL BE PROVIDED.

Dated: February 17, 2021

THE LAW OFFICES OF ROGER HIGGINS, LLC
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and

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

Laura Davis Jones (Bar No. 2436)
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Co-Counsel for the Reorganized Debtors